



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-ER

June 12, 2014

Mr. Anthony Brown
Atlantic Richfield Company
4 Centerpointe Drive
Project Manager, Mining La Palma, CA 90623-1066

Re: Rico Argentine Mine Site – Administrative Order for Removal Action (UAO)
Docket No. CERCLA-08-2011-0005: EPA Comments – Evaluation of Source Water Controls

Dear Mr. Brown:

The comments in this letter and the enclosure are provided on the Evaluation of Source Water Controls (Task E of the UAO Work Plan) report was submitted by Atlantic Richfield Company (AR) to EPA in December, 2013. The primary intent of these comments is to ensure that the conclusions presented in the report are valid and that the information used to arrive at these conclusions is presented. In addition, much of the historical records review regarding the workings and mine water related information is only minimally discussed and presented. As such, any benefit gained from the presentation of the consolidated and reviewed mine records is not captured in the report. The lack of that information may hinder EPA's ability to make current and future decisions at the Site.

One of the objectives of Task E is to determine if reducing the inflow to the workings is achievable to reduce the flow from the St. Louis Tunnel. As stated in the Work Plan in Section 5.5:

"The purpose of this task is to identify sources of water entering the mine workings that have the potential for being reduced or eliminated from contributing to the discharge at the St. Louis Tunnel and associated mine openings, and implement actions that are expected to significantly reduce flows and/or contamination of water flowing through the mine. The task includes review of existing data and evaluation of the data including geology, hydrogeology, mine workings, geologic structures, and other relevant features. Findings and recommendations for additional investigations will be submitted to EPA in a Technical Memorandum. Investigations will be conducted to confirm the findings of the data review, determine locations where significant flows of influent waters may be eliminated or reduced such that flows contributing to the metals load in the adit are reduced, and determine if it is feasible to install flow control structures. If it is determined that flow into the mine can be effectively reduced, then preliminary design concepts

for source water control structures will be prepared and submitted to EPA for approval. If it is determined that cost-effective options are available, then final designs will be completed and the control structures will be constructed in accordance with the approved designs.”

The report submitted to EPA does not contain the requirements described above. The enclosed comments from Weston-START identify specific elements of the report that lack necessary information. Please provide a written response to these comments by September 26, 2014. In addition, as part of this response, provide an addendum to the report presenting the specific mine maps, documents, data and other information obtained from the historical records review as required by the Order.

During our meeting on June 25th we will discuss these comments and determine an approach to responding to this request.

Sincerely,



Steven Way,
On-Scene Coordinator

cc: Amelia Piggott, 8ENF-L
Jan Christner, Weston-START
Thomas Kreutz, AECOM

Enclosure

